

State Water Resources Control Board

January 27, 2016

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7015 1520 0001 8019 5340

Mr. Collins Kalu
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
kaluc@metro.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT METRO DIVISION 1, 1130 EAST 6TH STREET, LOS ANGELES**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on January 13, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit – The facility permit to operate is expired.	All	October 1, 2015	Ongoing	H&SC 25284(a)
2	Failure to Maintain Plot Plan/Site Map – Monitoring site plan must be updated to include a scaled diagram which indicates the location of the underground storage tank (including tank, piping, auxiliary equipment) with respect to buildings or other landmarks.	All	January 13, 2016	Ongoing	23 CCR 2711(a)(8)
3	Failure to Tag Monitoring Equipment – The line leak detector was not tagged.	T6	January 13, 2016	Ongoing	23 CCR 2638(f)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Monitor Product Piping – The sensors in the piping sumps were unable to detect a leak at the earliest opportunity because the test boots are not pulled back from the double wall interstitial and the Schrader valves have the core in and cap on.	T6, T10, T11	January 13, 2016	Ongoing	23 CCR 2630(d)
5	Failure to Monitor Product Piping – The sensors in the piping sumps were unable to detect a leak at the earliest opportunity because it was not placed beneath product piping at the lowest point of the sump.	T1, T5, T6, T7, T8, T9, T11, T13	January 13, 2016	Ongoing	23 CCR 2630(d)
6	Failure to Install Line Leak Detectors – Pneumatic pumps have pressurized underground piping without line leak detectors. T7 did not provide a daily alarm log in lieu of having a line leak detector on pressurized piping for an emergency generator.	T7, T8, T9, T11	January 13, 2016	Ongoing	23 CCR 2636
7	Failure to Maintain Secondary Containment – The failed components listed on the secondary containment test have not been repaired or successfully retested.	T1, T5, T6, T7, T8, T9, T11, T13	June 6, 2011	Ongoing	H&SC 25291(a)(2)
8	Failure to Maintain UST Monitoring System – The green power light on the monitoring panel was not functioning at the time of inspection.	T7, T10, T11	January 13, 2016	Ongoing	H&SC 25291(b); 23 CCR 2630(d)
9	Tampering with Leak Detection Equipment – The sensors in T10's remote fill bays 9 and 16 were unable to detect a leak at the earliest opportunity because they were raised above the low point and resting on a nut. Sensors were lowered to the correct location at the time of inspection.	T10	January 13, 2016	January 13, 2016	H&SC 25299(a); 23 CCR 2630(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Lawrence Kim
Fire Inspector
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
lawrence.kim@lacity.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Captain Daniel Dragotto
Los Angeles City Fire Department
daniel.dragotto@lacity.org

Mr. Lawrence Kim
Fire Inspector
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Mr. James Jimenez
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